# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

DENNIS COOK, : CASE NO. 1:02cv00073

: (J. Weber)

Plaintiff

:

vs.

:

CITY OF NORWOOD, et al.,

:

**Defendants** 

JOINT MOTION TO EXTEND TIME TO RESPOND TO APPLICATION FOR ATTORNEYS' FEES AND COSTS

Come now Plaintiff and Defendant, City of Norwood, by and through counsel, and respectfully move this Court for an extension of time until and including *February 21, 2005*, for Defendant, City of Norwood, to respond to Plaintiff's Application for Attorneys' Fees and Costs (Doc. 143). This Joint Motion is supported by the Memorandum attached hereto.

### s/ Robert G. Kelly

Ohio Bar Number: 0002167 Attorney for Plaintiff, Dennis Cook 4353 Montgomery Road Norwood, OH 45212 513-531-3636 513-531-0135 (Fax) rgjfsjgreg@aol.com

## s/Lawrence E. Barbiere

Lawrence E. Barbiere
Ohio Bar Number: 0027106
Michael E. Maundrell
Ohio Bar Number: 0027110
Attorney for Defendant, City of Norwood
SCHROEDER, MAUNDRELL, BARBIERE & POWERS
11935 Mason Road, Suite 110
Cincinnati, OH 45249
(513) 583-4200
(513) 583-4203 (fax)

Email: lbarbiere@schroederlaw.com

Plaintiff has filed an Application for Attorneys' Fees and Costs in connection with the above captioned case. Plaintiff has also filed a Motion for New Trial and Defendant City of Norwood has filed a Motion for Judgment as a Matter of Law. In light of the time necessary to respond to the post-trial motions and in light of the fact that the post-trial motions may have an impact on the Application for Attorneys' Fees and Costs, the parties jointly move to extend the time for Defendant City of Norwood to reply to the Application for Attorneys' Fees and Costs until *February 21, 2005*. The parties respectfully submit a proposed Entry granting this Joint Motion.

# s/ Robert G. Kelly

Ohio Bar Number: 0002167 Attorney for Plaintiff, Dennis Cook 4353 Montgomery Road Norwood, OH 45212 513-531-3636 513-531-0135 (Fax) rgjfsjgreg@aol.com

### s/Lawrence E. Barbiere

Lawrence E. Barbiere
Ohio Bar Number: 0027106
Michael E. Maundrell
Ohio Bar Number: 0027110
Attorney for Defendant, City of Norwood
SCHROEDER, MAUNDRELL, BARBIERE & POWERS
11935 Mason Road, Suite 110
Cincinnati, OH 45249
(513) 583-4200
(513) 583-4203 (fax)

Email: <u>lbarbiere@schroederlaw.com</u>